

MSU's Code of Conduct

Introduction: With the passage of the 2008 Higher Education Opportunity Act (HEOA), postsecondary schools that participate in Title IV loan programs are required to have a code of conduct to which the school's employees shall comply.

Montana State University's Code of Conduct prohibits conflicts of interest with the responsibilities of employees or agents with respect to federal loans.

Ban of Revenue Sharing Arrangements: MSU shall not enter into a revenue-sharing arrangement with any lender, which is any arrangement between a school and a lender where the lender pays a fee or provides other material benefits to the school or its employees or agents in exchange for the school recommending the lender to its students.

Gift Ban: Any MSU employee or agent with responsibilities with respect to educational loans or financial aid is prohibited from requesting or receiving gifts from lenders, guarantors or loan servicers. A gift is any item or service having a monetary value of more than a de minimus amount.

Exceptions include the following:

- materials or services related to loan issues, default aversion and prevention, or financial literacy;
- expenses integrally related to training designed to improve service to the school and contribute to professional development;
- favorable loan conditions provided to students employed by the school if the same conditions are provided to all other students at the school;
- entrance and exit counseling services controlled by school staff and that do not promote a specific lender;
- contributions from a lender, guarantor or servicer made to a school that are philanthropic, unrelated to education loans or are not made in exchange for an advantage related to education loans;

- State education grants, scholarships or financial aid administered by or on behalf of the State.

Gifts to Family Members – Gifts to family members and others with relationships to MSU employees and/or agents shall be considered gifts to said employees and/or agents if they know about the gift and believe the gift was based on the position of the employee or agent.

Contracting Arrangements Prohibited – A MSU employee or agent with responsibilities with respect to education loans or financial aid is prohibited from receiving financial benefit from a lender or lender affiliate as compensation for any consulting or services provided to or for a lender.

Interaction With Borrowers – MSU shall not assign a loan for a first-time borrower to a particular lender or delay or refuse to certify a loan based on the borrower's choice of lender or guarantor.

Prohibition on Offers of Funds for Private Loans – MSU shall not request or receive an offer of funds from a lender for private education loans including funds for opportunity pool loans to its students in exchange for concessions or promises to the lender regarding the number or volume of Title IV loans made by said lender or a preferred lender status for such loans.

Ban on Staffing Assistance – MSU shall not request or accept assistance from a lender for call center or financial aid office staffing. A school can, however, receive assistance for financial aid training, lender identified educational materials for borrowers, and short-term non-recurring staffing assistance during emergencies.

Advisory Board Compensation – Any MSU employee with responsibilities with respect to education loans or financial aid who serves on an advisory group established by a lender, guarantor, or group of lenders or guarantors, may only receive reimbursement for reasonable expenses related to serving in the group.

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